

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

DARRYL ANDERSON, et. al.,

Plaintiffs,

v.

PERDUE FARMS INC.,

Defendant.

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**CIVIL ACTION NO.
1:06-cv-01000-MEF-WC**

**NOTICE OF FILING ADDITIONAL
NOTICES OF CONSENT TO JOIN**

Plaintiffs give notice of filing the attached Notices of Consent to Join executed by, LASHONDA GLENN, R.L. VICKERS, LASHONDRA DAVIS, HENRIETTA ANDREWS, ANGELA L. DUNBAR, TONYA FREDERICK, SHARON HESTER, CURTIS LEE WYMES, and JOANN LEE, similarly situated employees to Plaintiffs who likewise are or were subjected to the illegal pay practices at issue and who wish to join the above-captioned lawsuit.

Dated: April 25, 2007

Respectfully submitted,

THE COCHRAN FIRM, P.C.

/s/ Robert J. Camp

ROBERT J. CAMP

BERNARD D. NOMBERG

505 North 20th Street, Suite 825

Birmingham, AL 35203

(205) 930-6900 (Phone)

(205) 930-6910 (Fax)

– and –

Samuel A. Cherry, Jr.

Lance H. Swanner

THE COCHRAN FIRM, P.C.

163 West Main Street

P. O. Box 927

Dothan, AL 36302

(334) 793-1555 (Phone)

(334) 793-8280 (Fax)

– and –

Richard B Celler

MORGAN & MORGAN, P.A.

284 South University Drive

Fort Lauderdale, FL 33324

(954) 318-0268 (Phone)

(954) 333-3515 (Fax)

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on April 25, 2007, I electronically filed the foregoing Notice of Filing Additional Notices of Consent to Join with the Clerk of the District Court using the CM/ECF system, which sent notification of such filing to:

Sandra B. Reiss
sandra.reiss@odnss.com

Lance Harrison Swanner
lswanner@cochranfirm.com

James J. Kelley
jkelley@morganlewis.com

Bernard D. Nomberg
bnomberg@cochranfirm.com

Brian Z. Liss
bliss@morganlewis.com

Samuel A. Cherry, Jr.
scherry@cochranfirm.com

/s/ Robert J. Camp
ROBERT J. CAMP

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

LaShanda Glenn states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms at
[Name of plant]
the facility located in Dothan Ala. I worked at this location from
[City/State]
06-17-05 to present.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Dothan Ala, and
[Name of Plant] [City/State]
possibly other plants owned by Perdue Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 29 day of March, 2007.

LaShanda Glenn
[PRINT NAME]

LaShanda Glenn
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

R. L. Vickers states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms at
[Name of plant]
the facility located in Dothan Ala. I worked at this location from
[City/State]
7. 1989 to present.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Dothan Ala, and
[Name of Plant] [City/State]
possibly other plants owned by Perdue Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of March, 2007.

R. L. Vickers
[PRINT NAME]

R. L. Vickers
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Lashondra Davis

[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms at
[Name of plant]
the facility located in Dothan, AL. I worked at this location from
[City/State]
06/93 to present.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Dothan, AL, and
[Name of Plant] [City/State]
possibly other plants owned by Perdue Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 27 day of October, 2006.

Lashondra Davis
[PRINT NAME]

Lashondra Davis
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Henrietta Andrews states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms at
[Name of plant]
the facility located in Dothan, AL. I worked at this location from
[City/State]
8/2003 to 2/2005.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Dothan, AL, and
[Name of Plant] [City/State]
possibly other plants owned by Perdue Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 3 day of April, 2007.

HENRIETTA ANDREWS
[PRINT NAME]

Henrietta Andrews
[SIGNATURE]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Angela L. Dunbar states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms at
[Name of plant]
the facility located in Dothan ALA. I worked at this location from
[City/State]
2/28/04 to Present.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Dothan ALA, and
[Name of Plant] [City/State]
possibly other plants owned by Perdue Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9th day of April, 2007.

Angela L. Dunbar
[PRINT NAME]

Angela L. Dunbar
[SIGNATURE]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

TONYA FREDERICK states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by PERDUE FARMS at
[Name of plant]
the facility located in DOHHAN, AL. I worked at this location from
[City/State]
MAY 3, 1999 to PRESENT.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in DOHHAN, AL, and
[Name of Plant] [City/State]
possibly other plants owned by Perdue Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 29 day of Sept, 2006.

TONYA FREDERICK
[PRINT NAME]

Tonya Frederick
[SIGNATURE]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Sharon Hester states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by PERDUE FARMS, Inc at
[Name of plant]
the facility located in Dothan AL. I worked at this location from
[City/State]
July 20, 1997 to Present.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the PERDUE FARMS, Inc plant in Dothan AL, and
[Name of Plant] [City/State]
possibly other plants owned by PERDUE. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 14th day of APRIL, 2007.

Sharon A. Hester
[PRINT NAME]

Sharon A Hester
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

CURTIS LEE WYMES states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms at
[Name of plant]
the facility located in Dothan, AL. I worked at this location from
[City/State]
11/1997 to present.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Dothan AL, and
[Name of Plant] [City/State]
possibly other plants owned by Perdue Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 21st day of March, 2007.

CURTIS LEE WYMES
[PRINT NAME]

Curtis Lee Wymes
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Joann Lee states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farm at
[Name of plant]
the facility located in Dothan Ala. I worked at this location from
[City/State]
4-16-1999 to ~~4-16-1999~~ Present
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farm plant in Dothan Ala, and
[Name of Plant] [City/State]
possibly other plants owned by Perdue Farms If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 4 day of 15, 2007.

JoAnn Lee
[PRINT NAME]

Joann Lee
[SIGNATURE]